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March 27, 2024

VIA ECF

The Honorable John P. Mastando III  
United States Bankruptcy Judge  
U.S. Bankruptcy Court – SDNY  
One Bowling Green  
New York, New York 10004

**Re: *In re JJ Arch LLC***  
**Case No. 24-10381 (JPM)**

Dear Judge Mastando:

We are co-counsel to Jared Chassen. We write jointly with counsel for Arch Real Estate Holdings LLC (“AREH”), regarding Mr. Chassen’s Motion for an Order Dismissing the Debtor’s Bankruptcy Case [ECF DE 4] (the “Motion to Dismiss”) and AREH’s joinder to the Motion to Dismiss [ECF DE 13]. In light of the recent filing of (i) Mr. Chassen’s Motion for Entry of an Order (I) Confirming That the Automatic Stay Does Not Apply to Certain Corporate Governance Disputes, and/or (ii) Modifying the Automatic Stay as Necessary in Order to Address Such Corporate Governance Disputes [ECF DE 40] and (ii) AREH’s Motion For Entry Of An Order (i) Confirming That The Automatic Stay Does Not Apply to Certain Corporate Governance Disputes, and/or (ii) Modifying The Automatic Stay As Necessary In Order To Address Such Corporate Governance Disputes [ECF DE 38] (collectively, the “Stay Relief Motions”), Mr. Chassen and AREH and JJ Arch LLC (the “Debtor”) have agreed to adjourn the Motion to Dismiss pending the Court’s determination of the Stay Relief Motions, so that the Court and all parties may collectively preserve resources that would otherwise be expended in a contentious discovery process relating to the Motion to Dismiss.

With that in mind, Mr. Chassen and AREH write to respectfully request that the Court convert the evidentiary hearing on the Motion to Dismiss, which is currently scheduled on April 5, 2024, into a status conference. Subject to the Court’s approval, the parties, including Mr. Chassen, AREH, the Debtor and Jeffrey Simpson, have agreed to put all discovery on the Motion to Dismiss on hold pending the requested status conference on April 5, 2024, at which time the parties anticipate discussing with the Court a further adjournment of the Motion to Dismiss and resetting the deadlines associated with related discovery.

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None of the foregoing alters the schedule with respect to the Stay Relief Motions, which will be heard on April 5, 2024.

We will be available at the Court's convenience if the Court wishes to discuss any of the foregoing. Thank you for consideration of this request.

Respectfully submitted,

*/s/ Sean C. Southard*

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